

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THANIA FERNANDEZ, on behalf of herself,
individually, and on behalf of all others
similarly-situated,

Plaintiff,

-against-

CATHOLIC GUARDIAN SERVICES f/k/a
CATHOLIC GUARDIAN SOCIETY AND
HOME BUREAU, and CRAIG LONGLEY,
individually, GRACE POPPE, individually,
and DOLORES ORTIZ, individually,

Defendants.

Case No.: 17-cv-3161(ER)

DECLARATION OF INGRID PACHECO

Ingrid Pacheco, declares under the penalty of perjury that the following is true and correct:

1. I am over eighteen years of age and are currently employed by Catholic Guardian Services (“CGS”), as an Employment Manager in its Human Resources Department. I have held that position since July 1, 2015. I have been employed in other positions in CGS’s Human Resource Department since January 2006. (CGS had various names during this period). As such, I am familiar with CGS’s hiring practices and job requirements.
2. I have provided CGS’s attorneys in this action true and accurate copies of the personnel files for Thania Fernandez, Katherine Pineyro-Rojas De Jesus, Jisette Vargas, and Auribeny Troncoso (a/k/a Auribeny De Jesus).
3. True and accurate copies of the job descriptions for the Caseworkers position in the Foster Board Home (“FBH”) Program, and the Caseworker (a/k/a Case Manager) position in the Unaccompanied Minors Program (“UAC”) are attached as Exhibits A and B, respectively.

4. CGS pays all FBH Caseworkers and UAC Case Managers on a salary basis of greater than \$455/week.

Dated: New York, New York
September 14, 2017

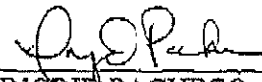
 9/14/2017
INGRID PACHECO

Exhibit A

CATHOLIC GUARDIAN SOCIETY & HOME BUREAU

POSITION TITTLE	CASEWORKER
DEPARTMENT	FOSTER BOARDING HOME
QUALIFICATIONS	BA/BS in related field BSW preferred Experience in Child Welfare, helpful

BASIC FUNCTION

As the primary contact, informant (and advocate); implements and monitors social service programming directed towards the timely achievement of permanency for children in accordance with principles of good social work practices. This should include associated with separation from birth families and possibly siblings and maintenance of child within the community.

Implements and documents compliance with all mandated requirements and outcome resources of the Administration for children's services (ACS) related to the Contractor's Overall Performance Evaluation System (COPES) and ACS Foster Care Standards, including UCR, Service Plan Reviews, Child Evaluation and Legal Authorization requirements.

MAJOR DUTIES AND RESPONSIBILITIES

Participates as a member of the interdisciplinary team, i.e. Service Plan Reviews/ Quarterlies, Treatment Team meetings, Joint Planning meetings if applicable.

Provides the necessary documentation in a timely fashion to support casework services, including but not limited to Progress Notes, Plan Amendments, 853D's-853C's, UCR's, Child Evaluations (W-840's)

Regularly attends individual and group supervisory conferences to review organization, caseload management, activity and performance. Within the supervisory / Educational context the caseworker should develop sophisticated skills in understanding assessing and engaging children, families and resource parents in the service plan process and create workable and realistic service plans. While there is general latitude for independent performance for broadly defined situations, there is shared accountability with the supervisor to maximize delivery of services of the highest quality.

Collaborates in the program's establishment and development of linkages with relevant community service; and works cooperatively with all resources. Along with concurrent planning: the caseworker addresses the acquisition of skills necessary for emancipation or

resources; and the provision of structured, predictable, routine living environment that can advance the development needs.

Engages with birth families and implements family to family approach to the delivery of services to birth families for purposes of reunification, addressing issues which necessitated placement to begin with.

Follows procedures for the timely identification of children requiring transfer from one level of care to another, including high risk case review protocol, and a smooth transitioning process.

Reinforces consistency of the implementation of effective behavior management and substance abuse prevention programs, if appropriate. Documents children's participation in the agency's independent living program, if child is age appropriate.

Documents accuracy of reporting status for respective cases assigned and follow-up on children absent from care.

Attends mandated training programs in accordance with guidelines set by governmental oversight bodies and pursuit of knowledge related to the social work practices.

Must be responsive to rapidly changing needs of clients which requires flexibility of schedule in addition to regular duties.

REPORTING RELATIONSHIP

Casework Supervisor Foster Boarding Home

RESPONSE REQUIREMENTS

Applicants must furnish a written response to the following questions:

1. Why is the applicant interested in this position?
2. How has the applicant's prior experience prepared her/him to effectively perform the requirements of this position?
3. What special skills and qualities does the applicant bring to this position, and how will they be manifested in the position?

INSTRUCTIONS FOR APPLICANT

The applicant must submit a copy of her/his resume, along with a written response to each of the above questions. All applications are to be submitted to Director of Human Resources, Catholic Guardian Society & Home Bureau, and 1011 First Avenue, New York, New York 10022. A copy of the application is to be furnished by the applicant to her/his direct supervisor.

Exhibit B

CATHOLIC GUARDIAN SOCIETY AND HOME BUREAU

POSITION TITLE: CASEWORKER, Unaccompanied Alien Children (UAC) Services Program

DEPARTMENT: Child Welfare Services

REPORTS TO: Program Director, UAC Services Program

CGSHB's Unaccompanied Alien Children Services Program serves children/youth presenting a range of challenging behaviors, especially those related to symptoms of trauma. The Program's services are provided by bilingual (Spanish/English) staff who receives specialized training in the special needs of refugee children and in Evidence-Based Trauma Focused-Cognitive Behavioral Therapy (TF-CBT). The program provides a safe, therapeutic environment in a family-like setting that addresses the requirements of each child/youth in a manner that is sensitive to his or her age; preserves cultural, ethnic and religious heritage; and meets dietary needs, native language, sexual orientation, gender identity, and other critical individual needs.

Responsibilities

The Caseworker's responsibilities include but are not limited to the following:

1. Maintain direct contact with each child/youth assigned
2. Maintain direct contact with the child's/youth's family to the extent possible
3. Conduct case management tasks
4. Provide services focused on completing safe and efficient family reunification
5. Work with Lead Caseworker and other staff on development and implementation of Individual Service Plans
6. Screen for human trafficking concerns
7. Document the provision of services in child's/youth's case record
8. Participate in ongoing training
9. Participate in case conferences
10. Perform other duties as requested
11. Respond in a positive and respectful manner to diversity, among the agency's service population and staff

Qualifications

- BSW, or other Bachelor's degree in psychology, sociology or other relevant social services or behavioral field
- Employment experience in relevant field
- Knowledge of child welfare/child protective services
- Strong organizational, planning and analytical skills
- Effective communicator with excellent writing and speaking skills
- Proficient computer skills